



## AUSTIN FRIARS

### LOW LEVEL CONCERNS POLICY 2025/26

The commitment to diversity, equality, and inclusivity is at the heart of our values at Austin Friars. Equality means creating an environment where pupils have the chance to achieve their full potential, free from barriers, prejudice, and discrimination. Inclusion is about recognising that each pupil is unique and that their needs can be met in different ways. Diversity means recognising, respecting, and celebrating the added value that differences bring. Our unwavering dedication to our school values – Truth, Love and Unity - is how we fulfil our mission at Austin Friars. It is through our commitment to diversity, equality, and inclusivity that our pupils are empowered to be authentic and succeed.

Austin Friars is an equal opportunities employer and is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

At Austin Friars, we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately. We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos.

This policy also aims to protect staff working in our school from potential false allegations or misunderstandings. This policy should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies.

This policy follows guidance contained in the Keeping Children Safe in Education document and associated advice: [KCSIE \(2025\)](#)

This policy sets out how to identify and record a low-level concern and thus, is not in itself a formal process or investigation.

#### **Who Does it Apply to?**

This policy applies to all staff, meaning anyone working in or on behalf of the school, such as a paid employee, including supply teachers, worker or contractor, or unpaid member of staff or volunteer, and trustees.

#### **What is a Low-level Concern?**

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the school to refer to the local authority.

Low-level concerns are part of a spectrum of behaviour. This includes but not limited to:

- inadvertent or thoughtless behaviour
- behaviour that might be considered inappropriate depending on the circumstances
- behaviour which is intended to enable abuse.

Examples of such behaviour could include but not limited to:

- being over friendly with children
- having favourites

- adults taking photographs of children on their mobile phone

### **Allegation vs Low-level Concern vs Appropriate Conduct**

#### **Allegation:**

Any adult linked to our school who has:

- behaved in a way that has harmed a child, or may have harmed a child and/or:
- possibly committed a criminal offence against or related to a child and/or:
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;

#### **Low-level Concern:**

Any adult linked to our school who has behaved in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

#### **Appropriate:**

Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

### **How to share a Low Level Concern**

A member of staff who has a concern about a colleague, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk, should inform the Designated Safeguarding Lead (DSL) or the Head as soon as possible ideally within 24 hours of becoming aware of it.

The concern can be shared verbally with the DSL or Head or by completing the form in on the school CPOMS (staff safe) – Details in Appendix 1. If reported verbally, the DSL/Head should record the information using the Low-Level Concern section of CPOMS (Staff safe).

Should a member of staff wish to report a concern, and not be named, this request should be respected as far as possible.

Staff are encouraged to self-refer in the event they have found themselves in a situation which may be misinterpreted and/or on reflection they have behaved in a way that may be considered to fall below the expected professional standard.

### **How to handle a Low-level concern**

Upon receipt of a concern, the Headteacher or DSL must respond as soon as is reasonably practicable (within 5 days):

1. Review the concern/s. This may include asking the reporter of the concern to provide any further information/ clarification.
2. Discuss the concern with the person against whom the concern is raised. Providing them the right to reply to the concern and informing them of any action that may subsequently be taken. Records of Low Level Concerns will be held confidentially.
3. Follow the relevant procedure which may include a referral to the LADO or steps taken to address unprofessional behaviour.

### **How to record and store a Low-level concern**

Low Level concerns on CPOMS will be stored securely within CPOMS and will only be access by the DSL/Head. The Deputy DSL may access low-level concerns records where instructed by the DSL/Head. Low-level concern records must be kept centrally along with other safeguarding and child protection records, and within the staff personnel file. This will be stored in accordance with the school's GDPR and data protection policies.

The staff member(s) who reported the concern must keep the information confidential and not share the concern with any other person apart from the Head or the DSL.

When a member of staff leaves employment, any low-level concerns record will be reviewed as to whether that information needs to be kept. Consideration will be given to whether the content has still got any value, either as a safeguarding measure or because of possible relevance to future claims.

Low-level concerns will not be referred to in a reference unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Allegations against a teacher who is no longer employed by the school will be referred to the LADO and police if necessary. Contract or supply staff should follow the schools Low Level concerns policy and if a Low Level concern is raised about them, the school will get in contact with the relevant contact or supply agency by email to share the concerns.

**LADO**

The Cumberland Local Authority Designated Officers (LADO) will be contacted for advice or referrals as necessary. They can be contacted directly on:

Cumbria Local Authority Designated Officers

[LADO@cumbria.gov.uk](mailto:LADO@cumbria.gov.uk) will reach the designated officer on duty contact

**Tel Number 0300 303 3892**

Rebecca Wardlow [Rebecca.Wardlow@cumberland.gov.uk](mailto:Rebecca.Wardlow@cumberland.gov.uk) 01768 812267

Claire Holmes - Deputy Head (Pastoral)

January 2026

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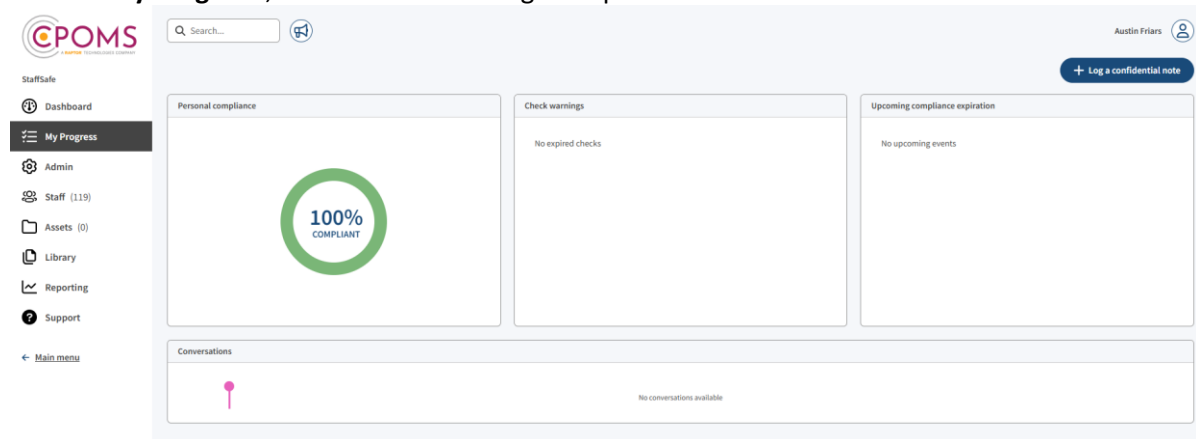
Current version reviewed and endorsed by Full Trustees Meeting on: 5<sup>th</sup> January 2026

## APPENDIX 1

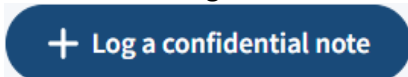
### **CPOMS StaffSafe - How to add a Confidential Note (LOW LEVEL CONCERN)**

Log into Staff Safe

To add a '**Confidential Note**' against another staff members profile, log-in to CPOMS StaffSafe and click on '**My Progress**', in the left-hand navigation panel.



Click on the '+ Log a Confidential Note' button, to the right-hand side.



Complete the on-screen '**Note**' form next:-

Log a note about a staff member

Staff member\*  
Nothing selected

Select a category\*  
Other Appraisal Low Level Concern LADO Referral Staff Wellbeing PDR Lesson Observation Allegation against staff Confidential Welfare Concern Parental Complaint  
Sickness Note

Notify manager  
Search for manager...  
Only managers who have the permissions to view all the categories selected will appear in this list.

Note text:\*  
Note context... [Attach files](#)

Date and time:\*  
12/11/2024 14:24

[Create Note](#)

*Example notes include absences, meetings, appraisal notes and allegations against Staff.*

- **Staff Member:** Search for the relevant staff members name, once it appears click on it to select them.
- **Notify staff members:** If you would like to alert a staff member to this note, search for their name and select it once it appears. You may choose more than one staff member to alert if required or leave blank if you do not wish to alert anyone in this instance.

- **Note text:** Fill in the 'Note context' box with all of the required information. This is a free text box so you can add as much or as little as needed.
- **Attach files:** If you would like to attach a file/ document to support the note e.g. a letter, minutes to a meeting or a doctors note for example, you can do so at this point. Simply click 'Attach files' to browse and locate the relevant file(s) on your machine.
- **Tick a category(s):** Tick at least one category to assign the note to. If there is an overlap you may select more than one. *You must create your own category list within the 'Admin' area > 'Categories' tab.*
- **Date and time:** This will default to the current date and time, however if you wish to change it to when the event took place you can do so here.
- Click '**Create Note**' when you are ready. This will save the note to the staff member's profile and alert any staff chosen to be notified via email and within the CPOMS StaffSafe notification section.

### **Adding Comments to a Confidential Note**

Once you have added a 'Confidential Note' to the system, **alerted staff members and those with access to this area only**, can add any follow-up comments to it.

Simply locate the note (*via the alert or through the staff members profile > 'Confidential Notes' tab*) and click on the '**Add Comment**' button just beneath it, to the right-hand side.

Only Head and DSL will have access to Low Level concerns.